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December 18, 2003

Leah S. Palmer
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Edwards for President: FEC Id. No. C00384073, October Quarterly Report

Dear Ms. Palmer,

This is in response to your letter requesting additional information pertaining to the above-listed report of Edwards for President (the Committee). The following sections are headed to address the issues raised in your letter.

Contributions:

You have requested additional information on the reattribution, redesignation or refund of certain contributions that are so marked in your request. The Committee has reviewed the contributions noted by you and is providing the following information. Because this response must be filed electronically, a copy of the Committee's report and checks will be provided under separate cover, but ask that they not be placed on the public record for the contributors' privacy and financial protection.

With respect to twenty-nine (29) of the contributions noted, the Committee made inadvertent attribution mistakes. In each of these cases, the Committee received a contribution from a joint checking account or a joint credit card contribution on the Internet and did not split the contribution correctly between the joint account holders or the wrong portion was attributed. Unfortunately, due to our data entry errors, the contributions appeared to be excessive when they were not. These are the contributions from Balisok, Beard, Bishop, Blitz, Broadus, Caminiti, Covington, Dearie, Drivon, Ferrer, Feldman, Fitzgerald, Gallina, Gilcrease, Kynard, Lambert, Landskroner, Liapakis, Maxwell, Murphy, Netherland, Parker, Sakalaris, Saltman, Sokolove, Tamez, Vanderginst, Vittoe, and Wood. Amendments of previous quarterly reports will be filed to correct the public record pertaining to twenty-seven (27) of these contributions. The remaining reattributions will be reflected on the Year End Report. Copies of the checks will be provided. In the cases of Joslin, Nance and Sokolove, after the attribution error was corrected, there was also an excessive contribution. The refunds for these three contributors will be reflected on the Year End Report. Again, copies of the refund checks will be provided under separate cover.

In one case, the Commission has confused two different contributors with the same name. The contributions from John Collins are from two separate individuals, at two different addresses, and with two different occupations and employers. We will provide these checks.

You also noted two different \$1,500 contributions from Meredith Bluhm, which, combined, resulted in excess of the \$2,000 maximum permitted. Due to an inadvertent data entry error, this one contribution was recorded twice under Meredith Bluhm's name. Another contributor, Leslie Bluhm, also contributed \$1,500, but her name was recorded as Meredith Bluhm in error. The result is one \$1,500 contribution by Meredith Bluhm, and one \$1,500 contribution by Leslie Bluhm. The error has been corrected, and we will file an amendment that corrects the record of the Bluhm contributions.

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With respect to the contributions from Rachelle Goldsmith and Goldsmith Richman & Harz LLP, the Commission has taken one contribution into consideration twice. There is one donation from Rachelle Goldsmith for \$3,000, and one donation from Goldsmith Richman & Harz LLP for \$2,000. However, Rachelle Goldsmith contributed an excessive amount through a partnership check under the name of Goldsmith Richman & Harz LLP; the Committee timely refunded the excessive portion. There was an additional donation from Goldsmith Richman & Harz LLP that the Committee refunded late.

With respect to eight (8) of the contributions noted, the Committee has timely refunded the excessive portion of the contributions (i.e. within sixty days). These are the contributions from Beusting, Carpenter, Collins, Durham, Goldsmith, Masry, Renslow, and Voorhies. These seven refunds will be reflected on the Year End report and these checks will be provided under separate cover.

Eleven (11) of the contributions noted by you were refunded late. These are Bernard, Broschay, Collier, Goldsmith Richman & Harz LLP, Greene, Joslin, McDaniel, Nance, Quinn, Schwartz, and Sokolove. These eleven refunds will be reflected on the Year End report and the checks will be provided under separate cover.

As for the contributions found excessive past the sixty days, we have reviewed the Committee's process for tracking and processing excessive contributions, and we have instituted strict procedures to ensure that all contributions are handled in a manner in full compliance with this and all other applicable provisions. The Committee has always intended to fully comply with the reattribution, redesignation, and refund provisions set forth by the Commission. We acknowledge that the Commission views excessive contributions as a serious issue, and we have taken steps to deal with them accordingly.

Best Efforts

Additionally, the Commission has requested the Committee to demonstrate that best efforts have been used to obtain required information for those individuals who contribute in excess of \$200 in an election cycle. The Committee has made a concentrated effort to not only meet the requirements, but far surpass the regulations by actually disclosing all pertinent information. All paper solicitations include a card that, in accordance with the regulations, requests all pertinent information. As part of the process of contributing via the Internet, our website includes a display of the regulations and requires the contributor to enter the information as a step in contributing. The Committee sends a written communication to the contributor requesting any missing information. In addition, the Committee has been taking the extra step of telephoning and emailing, when possible. It should be noted that we have reviewed our records and of the 262 contributors missing information (or 4.5% of all itemized donors) on the first quarter filing, 66 have already been updated on the successive amendment. After amending the first quarter report, 97.6% of itemized donors are listed with both occupation and employer. In our effort to amend the second quarter report to reflect updated occupation employer information, due to an inadvertent software error, our original Schedule A was reinserted into the file and thus did not reflect the updated information. Concurrently with this letter, the Committee is submitting an amendment to the second quarter report with the updated Schedule A. The Committee is also concurrently submitting an amendment to our third quarter report updating occupation and employer information for that period. The Committee believes its efforts and diligence are evidenced in these amendments and we will continue to meet not only the regulations, but will also strive to meet a higher standard.

Depository

Finally, you have requested further information regarding offsets from the Committee's designated depository. The Committee designated Wachovia Bank on its Statement of Organization (Form 1) filed January 2, 2003, but some of the offsets listed on the report are from First Union bank. This discrepancy is a result of a Wachovia and First Union merger, where all First Union branches came under the Wachovia name, but temporarily continued to use their stock of First Union checks. We will file an amendment to Line 20A of our October Quarterly report to reflect this more accurately.

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I hope that this information is sufficient for your review. However, should you desire any additional information please contact our Counsel Lyn Utrecht at 202-778-4007.

Sincerely,

Julius Chambers
Treasurer